South Coast
Air Quality Management District
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Presbyterian Intercommunity Hospital Renovation, Expansion and Interhealth Medical Office Building**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The air quality analysis is incomplete. The lead agency has not properly quantified emissions from the construction and operation of the project. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:GM
LAC070320-12
Control Number

**Air Quality Analysis**

1. In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposal includes the demolition of 112,098 square feet of existing building area, the construction of a new 217,715 square foot five-story medical office building on 8.4 acres, a new private road, some building renovation, a new 29 space parking deck and new surface parking. Although not included with the Draft MND, the lead agency did provide SCAQMD staff the output sheets from the California Air Resources Board URBEMIS2002 computer model used to estimate project short- and long term air quality impacts.

   In the URBEMIS2002 computer model output sheets (see also comment #2), the lead agency uses 92,200 square feet as the land use input to estimate project construction and operation air quality impacts. For the proposed project, it is not appropriate to estimate construction air quality impacts from the net increase in the building square footage. Construction impacts should be estimated based on all the activities listed in the project description. The lead agency should therefore rerun the URBEMIS2002 model or otherwise estimate building construction emissions using approved methodologies and emission factors to reflect all activities listed in the project description. The following comments pertain to the URBEMIS2002 computer model output sheets:

   - Phase I – Demolition emission estimates should account for following:
     - Off-road equipment emissions (there are no off-road equipment inputs in the model for the demolition phase).
     - Worker trip emissions.
   - Phase II – Site Grading emission estimates should account for the following:
     - The total land use area to be developed.
     - The total acreage disturbed per day.
     - There are no on- or off-road equipment inputs in the model for the site grading phase, e.g., heavy-duty construction equipment, import/export equipment for any cut or fill material, material transport trips, etc.
     - Worker trip emissions.
   - Phase III – Building Construction -emission estimates should account for the following:
     - The lead agency should account for the total 217,715 square feet of new building construction in its emission estimates.
     - On- and off-road equipment emissions (there are no on- or off-road equipment inputs in the model for the building construction phase).
     - Architectural coatings off-gas emissions (the sub phase architectural coatings was turned off in the model).

- Asphalt off-gas emissions (the sub phase asphalt was turned off in the model).
- Worker trip emissions.

Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

2. The lead agency needs to rerun the URBEMIS2002 model (see comment#1) and turn off all the mitigation measures related to mitigating fugitive PM10 impacts. The reason for this request is that the SCAQMD has recently identified a problem in the URBEMIS program whereby individual mitigation measures inappropriately reduce total PM10 emissions from the project instead of PM10 from the applicable emissions source. As a result, PM10 emission reductions are substantially overestimated. Until it is corrected, do not select a combination of PM mitigation measures for grading, but rather select the "user defined" control measure (watering three times per day) and then manually insert 68 percent in the control efficiency box. Further information concerning the URBEMIS 2002 computer model can be found on the SCAQMD's website at the following URL: http://www.aqmd.gov/ceqa/urbemis.html .

3. In the Final MND, the lead agency should include a discussion of operational emissions from stationary source equipment used during the operation of the facility, e.g., emergency backup generators, sterilizers, boilers, etc. This equipment would be subject to permit review with the SCAQMD and would have to comply with applicable SCAQMD rules and regulations.

**Localized Significance Threshold**

4. Because the proposed site is located less than a quarter-mile from an existing convalescence hospital and single-family residences to the south and existing single-family residences and Fred C. Nelles High School to the west, a localized air quality analysis may be warranted to ensure that the people in the existing convalescent hospital, high school residences are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html .

**PM2.5 Significance Thresholds**

5. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD

staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

**CO Hotspots Analysis**

6. In Table 11-2 on page 41 of the Revised Traffic Impact Study (Linscott Law & Greenspan, March 26, 2007), the Draft MND demonstrates that the one intersection listed below out of the thirteen study intersections shows a decline in the level of service during peak hours that would warrant a CO hotspots analysis.

   The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D. Please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address: http://www.dot.ca.gov/hq/env/air/coprot/htm .

   - Sorensen Avenue intersecting Whittier Boulevard shows a decline in the Level of Service during the AM peak hour from C to D.

**Construction On- and Off-Road Mitigation Measures**

7. In the event that the lead agency's revised air quality analysis shows that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce of oxides of nitrogen (NOx), fugitive dust (PM10), and volatile organic compounds (VOC) impacts from the project, if feasible:

   Recommended Additions:

   $NO_x$

   - Prohibit all diesel truck idling in excess of five minutes both on- and off-site;
   - Use alternative fueled off-road equipment;
   - Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
   - Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.

- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Improve traffic flow by signal synchronization.
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;

PM10 (Fugitive Dust)

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

VOC

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials.